

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JAN 22 2013
RW

----- C.A. No. 12-1411-GMS

KAROLINA KARPOV,)
Plaintiff,)
)
-v-)
VLADIMIR KARPOV and SVETLANA)
KARPOV,)
)
Defendants.)

APPLICATION FOR A
PRELIMINARY INJUNCTION OF
SALE OF DEFENDANT'S HOUSE AT
482 WEST CHESTNUT HILL ROAD,
NEWARK, DE 19713

TO THE COURT AND DEFENDANTS,

Plaintiff pro se, KAROLINA KARPOV, asks the court for the following recited relief forthwith pursuant to the penalties of perjury of the State of Delaware:

1. I am the Plaintiff, KAROLINA KARPOV.
2. I filed suit on May 23, 2012 in New York State against the defendants, my adoptive parents.
3. I did so because I was the victim of years of childhood sexual rape by Vladimir Karpov while Svetlana covered up his acts and beat me to stay quiet.
4. Svetlana asked the New York court to dismiss my complaint but the court instead granted a transfer of this action to your court as I had asked for. The New York Judge on the case issued an order on October 23, 2012.
5. This court assigned the above case number.
6. On December 1, 2012, I filed and served my motion to stay the sale of any of Defendant's property. Now, I see that Defendant's property at 482 West Chestnut Hill Road, Newark DE 19713 (the "Newark home") is for sale. See EXHIBIT A.
7. This property is the exact location where Vladimir Karpov repeatedly engaged in sexual intercourse with me while I was between the ages of seven and fourteen.
8. As for relief, I am seeking in this case to obtain all of the Defendant's property. Their property must be awarded to me because I participated in Vladimir's acquisition of all of it as his underaged mistress. The Newark home is currently listed at \$394,000 as a sale price and is being sold as a move to deprive me of it in response to my law suit. This is defendant's way of flouting the law and achieving financial immunity from me and this court. The better course is stay its transfer or in the alternative, to allow its sale and then

deposit into escrow its sales proceeds to fund this litigation against the defendants. Why should the taxpayers be charged for this case? Why can't my pro bono attorneys be reimbursed for at least some of their time and their expenses for perhaps accountants and other experts to better resolve this case. I could use some of this money to pay for incidental expenses such as transportation to Delaware and for other charges arising from this case.

9. This preliminary injunction must be granted. I stand a reasonable probability of success because my complaint of Vladimir's sex with me throughout my childhood is born out by the evidence that Vladimir accepted a felony plea for continuous sexual abuse of a child and rape in the 3rd degree. He even stole a car and drove to California where a policeman found him in a hotel with cash and a gun to avoid a Delaware warrant for his arrest. EXHIBIT B. This was in the Delaware news for months and can be found online today. EXHIBIT C. I am a suicide risk and have a mental health history that will show that I suffer from post traumatic stress disorder because of Vladimir and Svetlana.

10. I risk imminent threat of irreparable injury because if Svetlana sells the Newark home, I will get nothing of its value no matter the judgment of this court. Right now, because of the mental condition Vladimir and Svetlana put me in, I can neither work nor go to school. I am a prime candidate for public assistance. Vladimir amassed a fortune in real estate while raping me which Svetlana transferred over to herself when Vladimir went to prison. My complaint asks for an award of this property anyway so that I can support myself and use the proceeds to help others who are similarly repeatedly sexually assaulted as children.

11. When balancing equities, staying the sale of Vladimir's and Svetlana's Newark home is far less burdensome on them than the nightmare I am going through living each day penniless and helpless, begging for handouts and filing applications for public assistance. Vladimir does not need to reside in the Newark home because he is residing in the Delaware State Prison, and Svetlana has numerous places she can stay in. I understand she is now on the run anyway. One of her adult daughters is staying in the Newark home right now, and service of this motion is intended for her to deliver to Svetlana or to Vladimir in prison.

12. Therefore I ask for an order temporarily enjoining the sale of the Newark home pending the outcome of this case or in the alternative, placement of the sales proceeds into escrow as detailed above.

13. I affirm I mailed by first class mail this application to Defendant Svetlana Karpov, 482 W. Chestnut Road, Newark, DE 19713 because I do not know who her lawyer is on this case. I also affirm I mailed an original of this application to the Clerk of Court, United States District Court, District of Delaware, 844 North King Street Wilmington, DE 19801.


KAROLINA KARPOV

Dated: December 26, 2012

Exhibits: A, Newark home Property Listing as of December 1, 2012
 B, News Article July 6, 2007
 C, News Article July 7, 2007

482 W Chestnut Hill Rd , Newark, DE 19713

[Photos](#)[Map](#)[Bird's Eye](#)[Street View](#)**For Sale: \$394,000**

Price Cut: (Dec 1) -\$6,000

Zestimate®: \$384,001

Est. Mortgage: \$1,376/mo

See current rates on Zillow

See your \$0 Credit Score instantly!

Bedrooms: 6 beds**Bathrooms:** 4.0 baths**Single Family:** 4,050 sq ft**Lot:** 48,351 sq ft**Year Built:** 1945**Last Sold:** Sep 1997 for \$220,000**Parking:** Contact for details**Get more information****Jim Darden**

Prudential Fox & Roach

Your Name

Phone

Email Address

I am interested in 482 W Chestnut Hill Rd, Newark, DE 19713.

Learn how to appear as the agent above

[Get more info](#)[Save this home](#)[Get updates](#)[Email](#)[more ▾](#)**Description**

Rarely available 6 bedroom, 3/1 bath non-development home on over an acre lot right outside the city limits of Newark. The basement has been partially finished & features a stone fireplace. This is a big over 4,000 square foot house; look at the size of each room. There is an adjoining 2.39 acre lot...

[More](#)**Days on Zillow**
47**Cooling**
Central**Heating Type**
Forced air**Basement Type**
Unfinished**Fireplace**
Unknown**Floor Covering**
Carpet**Attic**
Unknown**Roof Type**
Other**Exterior Material**
Unknown**View**
Unknown**# Stories**
1.5**MLS #**
6133384[▼ More](#)[See data sources](#)**Similar Homes for Sale**[6 Montague Rd, Newark, DE](#)**For Sale: \$339,000**Beds: 4 Sqft: 2650
Baths: 3.0 Lot: 17424[2 Arizona State Dr, Newark, DE](#)**For Sale: \$414,890**Beds: 5 Sqft: 2900
Baths: 3.0 Lot: 17859[28 Montague Rd, Newark, DE](#)**For Sale: \$350,000**Beds: 4 Sqft: 2775
Baths: 3.0 Lot: 15246[See listings near 482 W Chestnut Hill Rd](#)**Zestimates**

	Value	Range	30-day change	\$/sqft	Last updated
Zestimate	\$384,001	\$269K – \$649K	+\$21,219	\$94	12/25/2012
Rent Zestimate	\$1,931/mo	\$1.3K – \$2.7K/mo	-\$79	\$0.48	12/24/2012
Owner Estimate	Post your own estimate				
Agent Comment	You must sign-in and claim this listing in order to post a comment				

Zestimate Listing price Rent Zestimate more1 year 5 years **10 years****Nearby Similar Sales**[2 Mesa Ct, Newark, DE 19713](#)**Sold on 5/31/2012: \$330,000**Beds: 5 Sqft: 3075
Baths: 2.5 Lot: 26571[5 Penn State Dr, Newark, DE 19713](#)**Sold on 11/26/2012: \$368,000**Beds: 4 Sqft: 3936
Baths: 2.5 Lot: 16552[108 Miners Ln, Newark, DE 19713](#)

Exhibit A

News

RIPON POLICE NAB MAN WANTED IN RAPE CASE

By **Jake Armstrong**

July 06, 2007

Record Staff Writer

RIPON - Police on Tuesday arrested a Delaware man wanted on suspicion of 50 counts of rape against a girl he adopted from Ukraine more than a decade ago.

Vladimir Karpov, 50, was taken into custody at the Ripon Motel after officers found the lone North Carolina license plate on his car had been reported stolen.

A search turned up an unregistered 9 mm handgun in the trunk and \$15,000 wrapped in a plastic bag inside his pocket, Ripon police Sgt. Ed Ormonde said. Officers arrested Karpov on weapons violations and suspicion of receiving stolen property.

A computer check of Karpov's name turned up a Delaware State Police warrant seeking his arrest on 50 counts of rape and one count of continual sexual abuse of a child, both felonies in Delaware. He is scheduled to be arraigned today in the Manteca branch of San Joaquin County Superior Court.

On a trip to Ukraine in 1996, Karpov arranged to adopt a 7-year-old girl who was in the care of a foster family, Delaware State Police spokesman Cpl. Jeff Whitmarsh said. The alleged sexual abuses began two weeks after he brought her to his home in Newark, Del., but were not uncovered until the girl in 2005 told her former foster family, which moved to New Jersey two years ago, Whitmarsh said.

State police detectives obtained a warrant for Karpov and put a hold on his passport when they learned he fled the state. The girl is now in the care of another family in New Jersey, Whitmarsh said.

Karpov told Ripon police he was innocent of the charges and was passing through town, which was what led an officer to check his license plate.

"We don't usually get a lot of out-of-town plates at that motel," Ormonde said.

Contact reporter Jake Armstrong at (209) 239-3368 or jarmstrong@recordnet.com.

Exhibit B

News

ACCUSED IN CHILD RAPE CONSENTS TO EXTRADITION

By **Scott Smith**

July 07, 2007

Record Staff Writer

MANTECA - A man arrested at the Ripon Motel this week agreed in a court hearing Friday to be extradited to Delaware, where he is accused of repeatedly raping a girl he adopted from Ukraine.

Ripon police arrested Vladimir Karpov, 50, on Tuesday after a check of his car's North Carolina license plate revealed the plate was reported stolen. Police also discovered a warrant for his arrest in Delaware on 50 counts of rape and a count of continual sexual abuse of a child.

During a 1996 trip to Ukraine, Karpov adopted a 7-year-old girl and began sexually abusing her shortly after bringing her to his Delaware home, police said.

Karpov, who wore handcuffs and a jail-issued jumpsuit Friday, politely stood each time San Joaquin County Superior Court Judge José L. Alva addressed him in the court's Manteca branch. Alva asked Karpov to remain seated.

Karpov said it was his first time in court.

Karpov pleaded no contest to charges of possessing an unregistered firearm and the stolen license plate from his arrest in Ripon. San Joaquin County Deputy District Attorney Brian Short reduced both counts to misdemeanors because of the extradition, and Alva levied three years of informal probation and a \$130 fine.

Alva also set Karpov's bail at \$2 million pending his transportation to Delaware.

Contact reporter Scott Smith at (209) 546-8296 or ssmith@recordnet.com.

[VISIT HIS BLOG](#)

Exhibit C

Barolina Karpol
305 Mill Street Apt 2A
Roughspire NY 12001

U.S.M.S.
X-RAY

Clerk of Court
United States District Court
District of Delaware
844 North King Street
Wilmington, Delaware 19801

